

In the Matter Of:

FAIR ISAAC CORPORATION

vs

FEDERAL INSURANCE COMPANY

HENRY MIROLYUZ

July 31, 2018

epiq
court reporting solutions

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1	from Tony Zhang to a number of people?		1 MR. FLEMING: Thank you.
2	A. Correct.		2 Q. "Blaze will be used as rules engine and
3	Q. Dated May 5, 2011?		3 will be installed on one of Toronto application
4	A. That is correct.		4 servers."
5	Q. Okay. Re: WorkManager design		5 Do you know what that means?
6	documents. Okay.		6 A. That they are planning to use the rules
7	If you would help me identify the people		7 engine as a part of this application. However, it
8	first. Svjetlana, the first person, Golubovic		8 does not tell if it was or was not implemented.
9	G-O-L-U-B-O-V-I-C, that person is -- who is that?		9 Q. And the rules engine is a reference to
10	A. I recall that she is a developer on		10 Blaze Advisor software?
11	Canadian IT team.		11 A. That is correct.
12	Q. Okay. Zorica Todorovic?		12 Q. Do you know that the Blaze Advisor
13	A. She is CIO of Canadian IT organization.		13 software installed on servers in Canada was installed
14	Q. Chief operating officer?		14 on servers located in Toronto, Canada?
15	A. Chief information officer.		15 A. I do not know. And judging by this
16	Q. Chief information officer Canada. Okay.		16 e-mail, I can't say if it was or was not.
17	Marina Maevska?		17 Q. Okay. Do you know from your interviews
18	A. Marina Maevska is, if I recall, she was		18 in preparing for the deposition whether Blaze Advisor
19	part of the IT team. I don't recall her exact role,		19 software in Canada was installed on servers located
20	in the developer or business analyst in Canada.		20 in different locations?
21	Q. In Canada. All right.		21 A. I know based on my conversation that was
22	Then under the ccs, Jack Wong.		22 installed on servers located in Canada. But however,
23	A. Yep. He is -- was developer on the		23 location, exact location, I'm not aware of those.
24	Canadian IT team.		24 Q. And whether that exact location was in
25	Q. Lei Lan, L-A-N?		25 one city or more than one city, you also don't know?
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1	A. Same thing. She is a member of the IT		1 A. I don't know.
2	team implementing the WorkManager.		2 (Exhibit 10, E-Mail Chain, marked for
3	Q. In Canada?		3 identification, as of this date.)
4	A. In Canada.		4 Q. Can we agree that Exhibit 10 is an
5	Q. And then Andy Kim?		5 e-mail from yourself to Tony Zhang with a copy to
6	A. Same as the above.		6 Patrick Sullivan dated November 15, 2011?
7	Q. And when you use the name WorkManager,		7 A. Correct.
8	what is that?		8 Q. Who is Patrick F. Sullivan?
9	A. I don't know that. Judging by the		9 A. Patrick F. Sullivan at the point of
10	e-mails, it's the application, but I don't know what.		10 writing this e-mail was the chief enterprise
11	MR. FLEMING: I object, lack of		11 architect for the job.
12	foundation.		12 Q. Is that a position to which you
13	Q. And do you know if WorkManager is an		13 reported?
14	application -- do you know if WorkManager used Blaze		14 A. Yes. I would report directly to him.
15	Advisor?		15 Q. Are you telling Mr. Zhang that he can
16	MR. FLEMING: Same objection.		16 download Blaze Advisor 7.0 from the internal web --
17	A. I don't.		17 internal Chubb website to be installed on servers in
18	Q. So when the -- under highlights, there's		18 Canada?
19	a sentence, "Blaze will be used as rules engine and		19 A. Correct.
20	will be installed on one of Toronto application		20 Q. Is it true as it was with the U.K., that
21	servers."		21 whatever applications were developed for use in
22	MR. FLEMING: Where are you reading that		22 Canada that deployed Blaze Advisor, those
23	from?		23 applications were also residing on Canadian servers?
24	MR. HINDERAKER: Fifth line down under		24 A. I cannot say one way or another. In
25	highlights.		25 Canada, I specifically have this information that

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<p>1 were resided in Canada. I mean, in UZEB (sic) or for 2 Canada, if they resided in Canada or U.S. servers, I 3 don't have that -- I cannot confirm it one way or 4 another.</p> <p>5 Q. From your knowledge and your interviews, 6 what reason would the insurance companies in Canada 7 have to install Blaze Advisor software on servers 8 located in Canada?</p> <p>9 A. That only reason I would think if they 10 have is the geographical location and latency 11 associated with that.</p> <p>12 Q. And you were using the word latency?</p> <p>13 A. Ability to exit the application over the 14 network. Speed of access.</p> <p>15 Q. Speed of access?</p> <p>16 A. Proximity provides better access.</p> <p>17 Q. Understood.</p> <p>18 What I'm asking you is -- I'll phrase it 19 this way; we agree that Blaze Advisor software was 20 installed and was installed on servers in Canada, 21 agreed?</p> <p>22 MR. FLEMING: Asked and answered.</p> <p>23 MR. HINDERAKER: Agreed, asked and 24 answered.</p> <p>25 A. Yeah.</p>	<p>1 A. Dali Yang is -- was one of the 2 developers or part of the IT team implementing or 3 involved on the project using the Blaze Advisor.</p> <p>4 Q. Okay. Implementing -- what did you say?</p> <p>5 A. Implementing projects used in the Blaze 6 Advisor software.</p> <p>7 Q. In the second paragraph, where he is 8 saying "We had another small project became the first 9 Blaze implementation in CAZ," do you know what that 10 project's name is?</p> <p>11 A. The only thing I can say, judging by the 12 attachment name of the subject of the e-mail, it says 13 CSI private company project.</p> <p>14 Q. Okay. And CAZ, does that stand for the 15 Canadian zone?</p> <p>16 A. Yeah, correct.</p> <p>17 Q. Do you know the geographical scope of 18 the Canadian zone?</p> <p>19 A. I don't. I assume it's Canada.</p> <p>20 MR. MURPHY: Don't assume.</p> <p>21 Q. Me, too.</p> <p>22 (Exhibit 12, E-Mail Chain, marked for 23 identification, as of this date.)</p> <p>24 Q. And can we agree that Exhibit 12 is an 25 e-mail from yourself to Tony Zhang, subject: Blaze</p>
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<p>1 Q. And do you know how the Blaze Advisor 2 software installed on servers in Canada was used?</p> <p>3 A. It was, to my knowledge, it was used as 4 the part of the applications which is one of the 5 exhibits. I don't recall the name.</p> <p>6 Q. And as being used as part of an 7 application, that application was also residing on 8 Canadian servers?</p> <p>9 A. This again, I would not confirm one way 10 or another. Components can be located in a different 11 server so if application was located servers in 12 Canada or U.S. I cannot say.</p> <p>13 Q. You don't know?</p> <p>14 A. I don't know.</p> <p>15 MR. FLEMING: So asked and answered a 16 couple of times now. Same question.</p> <p>17 MR. HINDERAKER: Thank you.</p> <p>18 (Exhibit 11, E-Mail dated June 18, 2012, 19 marked for identification, as of this date.)</p> <p>20 Q. Can we agree that Exhibit 11 is an 21 e-mail from Tony Zhang to yourself and others, 22 subject: Blaze rules review CSI private company 23 project dated June 18, 2012?</p> <p>24 A. Correct.</p> <p>25 Q. Who is Dali Yang?</p>	<p>1 upgrade to 7.1 dated June 7, 2013?</p> <p>2 A. Correct.</p> <p>3 Q. And why, do you recall, did you advise 4 Mr. Zhang that Blaze 7.1.1 is the standard version of 5 Blaze to use?</p> <p>6 A. By the enterprise standard, 7 architectural standard, software versions should be 8 uniform across the company. Thus, known Tony 9 involvement into the Blaze project, advising him that 10 the new version been released and used as the 11 enterprise standard now.</p> <p>12 Q. And do you know that -- perhaps separate 13 from this e-mail, do you know that in Canada, Blaze 14 7.1.1 was installed on Canadian servers?</p> <p>15 A. I don't know. My role was to provide 16 the information to him. It was up to him to -- what 17 to do with this information.</p> <p>18 Q. So whether he did or did not, you don't 19 know one way or the other?</p> <p>20 MR. FLEMING: Objection, asked and 21 answered.</p> <p>22 A. I don't know.</p> <p>23 Q. If you could find Exhibit 6 in your 24 stack. Do you have it?</p> <p>25 A. I do.</p>